

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA	:	CASE NO. 1:25-MJ-00245
	:	
v.	:	
	:	
STANISLAV “STAS” GRINBERG	:	

**SECOND JOINT MOTION FOR ORDER EXTENDING TIME
PERIOD FOR FILING INDICTMENT OR INFORMATION**

The parties hereby jointly move to further extend the Government’s time to file an indictment or information until July 10, 2025, inclusive. In support of this Second Joint Motion, the parties state as follows:

1. Defendant has been charged by Complaint, dated March 19, 2025, with conspiracy to commit wire fraud and bank fraud, in violation of 18 U.S.C. § 1349, and making false statements on loan applications, in violation of 18 U.S.C. § 1014.
2. Defendant was arrested on March 20, 2025 in the Southern District of Texas and made his initial appearance in that district on the following day (*i.e.*, March 21, 2025).
3. On April 10, 2025, Defendant made an initial appearance in this District. Defendant waived his preliminary hearing and was ordered detained.
4. On April 18, 2025, pursuant to a joint motion of the parties, the Court entered an order extending the Government’s deadline to file an indictment or information until May 29, 2025, inclusive.
5. On May 16, 2025, Defendant’s then-attorney filed a motion to withdraw, and, on May 19, 2025, the Court granted the order and appointed new counsel (who previously had represented Defendant at his initial appearance) to represent Defendant going forward.

6. The parties are exploring the possibility of a pre-indictment resolution of this complex financial matter, which involves allegations of multimillion-dollar fraud. Given the recent appointment of new counsel, these discussions will require more time to conduct than is afforded under the current indictment deadline.
7. Accordingly, the parties agree, and respectfully submit, that the ends of justice served by granting an extension of the deadline – up to and including July 10, 2025 – outweigh the best interest of the public and Defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A). Absent the requested extension, the parties will be denied the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and a miscarriage of justice would result, in that the parties will have inadequate time to evaluate and investigate the current charge and to discuss, consider, and negotiate a possible pre-indictment plea. *See id.* § 3161(h)(7)(B).
8. This Second Joint Motion will be supported by a Second Waiver of Timely Indictment or Information.¹ No hearing is requested on this Second Joint Motion.

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¹ Defendant has verbally authorized extension of the indictment deadline, and defense counsel anticipates procuring the signed Second Waiver imminently.

For the foregoing reasons, the parties respectfully request that the Government's time to file an indictment or information be extended up to and including July 10, 2025.

Respectfully submitted,

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